

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID DONALDSON,

Defendant.

Criminal Action No. 05- 83

REDACTED

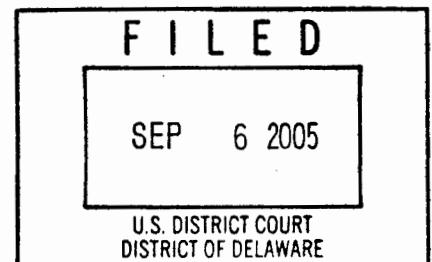
INDICTMENT

The United States Attorney for the District of Delaware charges that:

COUNT ONE

From on or about November 30, 2002 through on or about April 26, 2003, in the State and District of Delaware, DAVID DONALDSON, defendant herein, did knowingly and with intent to defraud effect transactions, with one or more access devices issued to another person, to wit, by causing twenty (20) credit card transactions affecting interstate and foreign commerce using VISA card numbers XXXX XXXX XXXX 9064 and XXXX XXXX XXXX 6318, issued by Provident Financial Corporation in the name of Charles Geiger, to be run through Preferred Rentals' merchant credit card account number XXXX XXXX XXXX 1483 with Nova Information Systems, Inc., when DONALDSON then and there well knew that Preferred Rentals had performed no services for which such payments were due or for which transactions were authorized, and for which transactions DONALDSON received payment and other things of value during the one year period from November, 2002 through November, 2003, the aggregate value of which is greater than \$1,000 and which transactions affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 1029(a)(5).



COUNT TWO

From on or about November 30, 2002 through on or about April 26, 2003, in the State and District of Delaware, DAVID DONALDSON, defendant herein, did knowingly conspire with G.A., a separately charged co-conspirator, to commit fraud in connection with access devices, to wit, with intent to defraud to effect transactions, with one or more access devices issued to another person, by causing twenty (20) credit card transactions affecting interstate and foreign commerce using VISA card numbers ~~XXXX XXXX XXXX 9064~~ and ~~XXXX XXXX XXXX 6318~~, issued by Providian Financial Corporation in the name of Charles Geiger, to be run through Preferred Rentals' merchant credit card account number XXXX XXXX XXXX 1483 with Nova Information Systems, Inc., when DONALDSON then and there well knew that Preferred Rentals had performed no services for which such payments were due or for which transactions were authorized, and for which transactions DONALDSON received payment and other things of value during the one year period from November, 2002 through November, 2003, the aggregate value of which is greater than \$1,000.

*Merchant number 87A 9/6/05*

All in violation of Title 18, United States Code, Section 1029(a)(5) and (b)(2).

COUNT THREE

From on or about December 5, 2002 through on or about May 18, 2003, in the State and District of Delaware, DAVID DONALDSON, defendant herein, did knowingly and with intent to defraud effect transactions, with one or more access devices issued to another person, to wit, by causing twenty-four (24) credit card transactions using VISA card numbers ~~XXXX XXXX XXXX 9064~~ ~~XXXX XXXX XXXX 6318~~, and issued by Providian Financial Corporation in the name of Charles Geiger, to be run through Supreme Limousinek, Inc.'s merchant credit card account number XXXX XXXX XXXX 2873 with Nova Information Systems, Inc., when DONALDSON then and

*Merchant number 87A 9/6/05*

there well knew that Supreme Limousine, Inc. had performed no services for which such payments were due or for which transactions were authorized, and for which transactions DONALDSON received payment and other things of value during the one year period from December, 2002 through December, 2003, the aggregate value of which is greater than \$1,000 and which transactions affected interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 1029(a)(5).

#### COUNT FOUR

From on or about December 5, 2002 through on or about May 18, 2003, in the State and District of Delaware, DAVID DONALDSON, defendant herein, did knowingly conspire with R.B., a separately charged co-conspirator, to commit fraud in connection with access devices, to wit, with intent to defraud to effect transactions, with one or more access devices issued to another person, by causing twenty-four (24) credit card transactions affecting interstate and foreign commerce using VISA card number/ *transit four number on 6/6/05* XXXX XXXX XXXX 9064 and XXXX XXXX XXXX 6318, issued by Providian Financial Corporation in the name of Charles Geiger, to be run through Supreme Limousine, Inc.'s merchant credit card account number XXXX XXXX XXXX 2873 with Nova Information Systems, Inc., when DONALDSON then and there well knew that Supreme Limousine, Inc. had performed no services for which such payments were due or for which transactions were authorized, and for which transactions DONALDSON received payment and other things of value

*December 9/6/05* *December 9/6/05*  
during the one year period from ~~November~~, 2002 through ~~November~~, 2003, the aggregate value of  
which is greater than \$1,000.

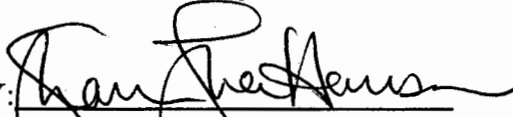
All in violation of Title 18, United States Code, Section 1029(a)(5) and (b)(2).

A TRUE BILL:

Foreperson

COLM F. CONNOLLY  
United States Attorney

BY:

  
Shannon Thee Hanson  
Assistant United States Attorney

Dated: September 6, 2005